ADRIENNE C. PUBLICOVER (SBN 161432) 1 WILLIAM LEE (SBN 148652) 2 WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP 650 California Street, 14th Floor 3 San Francisco, California 94108-2718 (415) 433-0990 4 Telephone: (415) 434-1370 Facsimile: 5 Attorneys for Defendants AMERICAN INTERNATIONAL GROUP, INC. and 6 THE AIG LIFE COMPANIES (U.S.) 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 MIRANDA YEE, Case No.: C03-5873 PJH (JCS) 11 STIPULATION TO EXTEND DATE BY Plaintiff, 12 WHICH PARTIES ARE TO COMPLETE THE SETTLEMENT CONFERENCE 13 WITH MAGISTRATE JUDGE SPERO THE AIG LIFE COMPANIES (U.S) as AND TO CONTINUE THE DATE FOR 14 Administrator and Fiduciary of the SUBMITTING THE STATUS AMERICAN INTERNATIONAL GROUP, STATEMENT; AND [PROPOSED] INC., and the AMERICAN INTERNATIONAL) 15 GROUP, INC., TANYA LEE, HAROLD **ORDER** JONES, KATHY COZA, and DOES 1-50, 16 The Honorable Phyllis J. Hamilton 17 Defendants. 18 19 Plaintiff Miranda Yee ("Plaintiff") and Defendants American International Group, Inc. and 20 The AIG Companies (U.S.) (collectively "Defendants"), through their respective counsel, agree to 21 stipulate as follows: 22 1. Following the hearing on the parties' motion for summary judgment on May 4, 2005, the 23 Court referred the above-captioned case to a settlement conference before Magistrate Judge Joseph 24 C. Spero and ordered that the settlement conference be completed by July 1, 2005. The Court also 25 ordered the parties to meet-and-confer and to submit a status statement to the Court by July 13, 26 2005; 27 28 STIPULATION TO CONTINUE DEADLINE TO COMPLETE SETTLEMENT CONFERENCE

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- 2. Magistrate Judge Spero scheduled a settlement conference for June 20, 2005. However, the Defendants' corporate representative, William Woods, Esq., is unable to attend or be present for the settlement conference as scheduled for June 20, 2005 due to prior scheduling conflicts and commitments. Specifically, Mr. Woods is chairing a charitable event occurring on June 20, 2005 in New York. Moreover, even if he did not have the charitable event, he could not travel on June 19, 2005 to be present the morning of June 20, 2005 because he is committed to being with his family in celebration for Father's Day.
- 3. Defendants have advised Magistrate Judge Spero and plaintiff's counsel of Mr. Wood's unavailability. In attempting to reschedule the settlement conference for a mutually convenient date, the parties have contacted Magistrate Judge Spero to obtain alternative dates. The parties have been advised that Magistrate Judge Spero is gone the last week of June and that he did not have any available dates prior to July 1, 2005. The parties were advised that the next available date was in mid-July (July 18) and that he had two other dates in late-July (July 26 and July 28);
- 4. The parties agree to reschedule the settlement conference to July 28, 2005. Plaintiff does not object to reschedule the settlement conference to July 28, 2005 or to extend the date for completing the settlement conference;
- 5. Because the parties believe it was the Court's intent to have the settlement conference completed prior to the submission of the status statements, the parties agree that the date for submitting the status statement should also be continued from July 13, 2005 to August 11, 2005 (14 days after the date of the July 28, 2005 settlement conference).

THEREFORE, IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES HERETO that the deadline for completing the settlement conference be extended beyond the current deadline of July 1, 2005 and that the parties intend to complete the settlement conference before Magistrate Judge Spero before July 31, 2005.

THE PARTIES FURTHER STIPULATE that the date for submitting the status statements to the Court be continued from July 13, 2005 to August 11, 2005.

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1	Dated: June 9, 2005
2	
3	WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER
4	LLP
5	
6	ADRIENNE C. PUBLICOVER
7	WILLIAM LEE Attorneys for Defendants
8	AMERICAN INTERNATIONAL GROUP, INC. and THE AIG LIFE COMPANIES (U.S.)
9	Dated: June 9, 2005 LAW OFFICES OF CRISOSTOMO G. IBARRA
10	Dated: June 9, 2005 LAW OFFICES OF CRISOSTOMO G. IBARRA
11	By: Gener Binifez
12	GENER D. BENITEZ
13	Attorney for Plaintiff MIRANDA YEE
14	
15	ORDER
16	Having reviewed the parties' foregoing stipulation and FOR GOOD CAUSE SHOWING,
17	IT IS HEREBY ORDERED AS FOLLOWS:
18	1. The July 1, 2005 deadline to complete the settlement conference before Magistrate
19	Judge Spero is vacated;
20	2. The parties must complete the settlement conference by July 31, 2005; and
21	3. The date for submitting status statements to the Court has been continued to August
22	11, 2005.
23	1/m
24	Dated: 6/13/05
25	The Honorable Phyllis J. Hamilton U.S. District Court Judge
26	
27	
28	STIPULATION TO CONTINUE DEADLINE TO COMPLETE SETTLEMENT CONFERENCE
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	TOTAL P.04